



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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January 21, 2020

Phadrea Ponds, Acting NPS Information Collection Officer
National Park Service
1201 Oakridge Drive
Fort Collins, CO 80525

Re: OMB Control Number 1024-0262

Dear Ms. Ponds:

The State of Alaska reviewed the Information Collection Federal Register Notice on *Community Harvest Assessments for Alaskan National Parks, Preserves, and Monuments*. The following comments represent the consolidated views of state resource agencies.

The Alaska Department of Fish and Game (ADF&G) Division of Subsistence has been conducting the surveys associated with this notice for over 30 years to collect important subsistence harvest resource data collaboratively with communities throughout Alaska in a respectful, voluntary, and confidential manner. The collection of subsistence harvest data may provide information that communities may find useful to support documentation of their subsistence needs. We appreciate the Service's support of ADF&G's data collection efforts, as well as the opportunity to comment in support of data collection efforts that are valuable to subsistence users.

It is critical that the Service fully support the ADF&G Division of Subsistence standard procedures for voluntary and confidential data collection and collaborate with the Division to fully support their standard procedures to collaborate with local communities where the subsistence harvest surveys are being conducted to allow the communities to determine what questions they desire to have included and the wording used in the surveys to first and foremost meet the local community's needs.

The 2017 National Park Service subsistence collections rulemaking clarified that the collection of shed and discarded animal parts used in the making and selling of personal handicrafts by rural residents is authorized in Alaska park units where subsistence is authorized under the Alaska National Interest Lands Conservation Act (ANILCA). As a result, the Service has proposed in some parks to add a new survey module on handicrafts in the subsistence harvest surveys which includes questions to obtain data related to this authorized use. To avoid unnecessarily alarming potential survey respondents who were likely not aware the Service did not consider subsistence collection for handicrafts an allowed use in the past, we request new survey modules on the subject ensure survey respondents know that ANILCA and Service regulations allow for this use in a manner that does not imply potential prior unauthorized

activities by respondents, e.g., by not specifying a particular implementation date in the survey question preamble or individual questions. The surveys should also ensure respondents are aware 43 CFR 13.482 and 36 CFR 13.485, allow for the collection of shed and discarded animal parts, and the collection of plant materials. Specifically:

- It is legal to collect shed or discarded animal parts (horn, antlers, bones, etc....) on Service lands for the making and selling of handicrafts for personal use, barter, or sale, or for qualified educational or cultural programs.
- It is legal to collect plant materials on Service lands for making handicrafts for personal use, customary trade, or barter, or for educational or cultural programs.

To avoid confusion, we request park staff continue to reach out to the State to review individual park survey content in collaboration with the ADF&G Division of Subsistence.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Magee', written in a cursive style.

Susan Magee
ANILCA Program Coordinator